

# FISHER | RAINEY | HUDSON

May 14, 2014

ATTN: Nicholas Peak  
950 W. Bannock, Ste. 900  
Boise, ID 83702  
(208) 378-5746

US EPA  
MAY 15 2014  
IDAHO OPERATIONS OFFICE

Re: Freedom of Information Act Request

Dear Mr. Peak,

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, I hereby request the following documents from the period beginning January 1, 1998, to the present day related to the cattle-feeding operations at the Simplot Livestock Company, Feedlot No. 3, located three miles west of the city of Caldwell on Highway 19 between Farmway Rd. and Wietz Rd. in Caldwell, Idaho ("Caldwell feedlot"):

- (a) The contents of any and all file(s) maintained by the EPA for the Caldwell feedlot.
- (b) All documents, electronic, paper or otherwise containing enforcement data including inspection reports, enforcement documents, complaints, or other compliance documentation relating in any way to the Caldwell feedlot.
- (c) All correspondence and/or records of correspondence including facsimile, email and texts, containing information related to the Caldwell feedlot, including:
  - a. EPA's internal correspondence,
  - b. Correspondence between the EPA, its agents or employees and the Idaho State Department of Agriculture ("ISDA"), its agents or employees,
  - c. Correspondence between the EPA, its agents or employees and J.R. Simplot Company or any of its divisions, agents or employees.
- (d) Any notes made by EPA employees and agents relating to activities at the Caldwell feedlot.
- (e) The name, position and contact information for all current and former EPA and ISDA employees who may have knowledge of compliance and/or enforcement activities at the Caldwell feedlot.

Please provide the requested documents in electronic PDF format if available.

Please respond within 20 working days, as required by law. If this request is denied in whole or in part, please provide a detailed justification for withholding the records. I also request any segregable portions that are not exempt be disclosed.

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910 W. Main St., Ste. 254  
Boise, ID 83702  
www.frhtriallawyers.com

Phone: (208) 345-7000  
Fax: (208) 297-2689  
naw@frhtriallawyers.com

Thank you for your prompt attention to this matter.

Very truly yours,



Nicholas A. Warden